

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ABDIKHADAR JAMA, an individual,  
ANEB ABDINOR HIREY, an individual,  
ROGIYA DIGALE, an individual,  
ABDISALAM MOHAMED, an individual,  
JASHIR GREWAL, an individual, UDHAM  
SINGH, an individual, SUKDEV SINGH  
BASRA, an individual, KHALIF  
MAHAMAD, an individual, JAMA DIRIA,  
an individual, AHMED F. GELLE, an  
individual, and LUL SALAD, an individual,

Plaintiffs,

v.

GCA SERVICES GROUP, INC., a foreign  
corporation,

Defendant.

No.

NOTICE OF REMOVAL

TO: All Plaintiffs and their Counsel

AND TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON

Defendant GCA Services Group, Inc., ("GCA") hereby provides notice of the removal of  
the above-entitled action from the Superior Court of the State of Washington for King County at

NOTICE OF REMOVAL - 1

1 Seattle to the United States District Court for the Western District of Washington at Seattle  
2 pursuant to 28 U.S.C. §§ 1332 and 1441. The grounds for removal are as follows:

3 1. On or about February 12, 2016, GCA was served with the Summons and  
4 Complaint for this action. A copy of the Summons and Complaint are attached to this Notice of  
5 Removal as Exhibit A. The Summons and Complaint were filed in the Superior Court of  
6 Washington for King County on February 9, 2016, Case No. 16-2-03082-3 SEA. Declaration of  
7 Timothy J. O'Connell in Support of Defendants' Notice of Removal ("O'Connell Decl."), Exhs.  
8 A and B. The only other pleadings filed in the King County Superior Court in this case are the  
9 Order Setting Civil Case Schedule, Case Information Cover Sheet, and Notice of Appearance.  
10 O'Connell Decl., Exhs. A - E.

11 2. GCA is a Delaware corporation and as reflected in the Complaint its principal  
12 place of business is in Ohio. There is thus complete diversity of citizenship between plaintiffs  
13 and defendant.

14 3. The amount in controversy of this putative class action exceeds \$75,000.00.

15 4. Under 28 U.S.C. § 1441(a), a defendant may remove to federal court a civil action  
16 "brought in a State court of which the district courts of the United States have original  
17 jurisdiction." Pursuant to 28 U.S.C. § 1332(a), federal jurisdiction exists when the amount in  
18 controversy exceeds \$75,000.00 and the action is between citizens of different states.

19 5. The Western District of Washington is the judicial district embracing the place  
20 where this action is pending. *See* 28 U.S.C. § 128(b).

21 6. In accordance with 28 U.S.C. § 1446(b) and Fed. R. Civ. P. 81(c), this Notice of  
22 Removal is filed within thirty (30) days of Defendants' receipt of Plaintiff's initial pleading. The  
23 state court in which this action commenced is within this Court's district and division.  
24 Therefore, this action is properly removable under 28 U.S.C. §§ 1441 and 1446.

25 ///

26 ///

NOTICE OF REMOVAL - 2

DATED: March 4, 2016 at Seattle, Washington.

STOEL RIVES LLP

s/Timothy J. O'Connell

Timothy J. O'Connell, WSBA No. 15372

600 University Street, Suite 3600

Seattle, WA 98101

Telephone: (206) 624-0900

Facsimile: (206) 386-7500

Email: [tim.oconnell@stoel.com](mailto:tim.oconnell@stoel.com)

Counsel for Defendant GCA Services Group,  
Inc.

NOTICE OF REMOVAL - 3

**CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 2016, I electronically filed the foregoing with the Clerk of the Court, and that copies of same were sent to the following attorneys of record by the method indicated below:

Duncan C. Turner  
Badgley Mullins Turner PLLC  
19929 Ballinger Way NE, Suite 200  
Seattle, WA 98155  
Telephone: (206) 621-6566  
Facsimile: (206) 621-9686  
Email: [duncanturner@badgleymullins.com](mailto:duncanturner@badgleymullins.com)

*via hand delivery*

Cleveland Stockmeyer  
Cleveland Stockmeyer PLLC  
8056 Sunnyside Avenue North  
Seattle, WA 98103  
Telephone: (206) 419-4385  
Email: [cleve@clevelandstockmeyer.com](mailto:cleve@clevelandstockmeyer.com)

*via hand delivery*

Daniel R. Whitmore  
Law Offices of Daniel R. Whitmore  
2626 15th Avenue West, Suite 200  
Seattle, WA 98119  
Telephone: (206) 329-8400  
Facsimile: (206) 329-8401  
Email: [dan@whitmorelawfirm.com](mailto:dan@whitmorelawfirm.com)

*via hand delivery*

*Attorneys for Plaintiff*

DATED: March 4, 2016 at Seattle, Washington.



Debbie Dern, Practice Assistant

NOTICE OF REMOVAL - 4